



<b>UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY</b>	
<b>Caption in Compliance with D.N.J. LBR 9004-2(c)</b>	
<b>RAS Citron, LLC</b>	
130 Clinton Road, Suite 202	
Fairfield, NJ 07004	
Telephone Number: 973-575-0707	
Attorneys For Secured Creditor	
Shauna Deluca, Esq. (SD-8248)	
<b>In Re:</b>	Case No.: 16-18469-VFP
<b>Norbey M Pareja,</b>	Chapter: 13
Debtor.	Judge: Vincent F. Papalia

**CONSENT ORDER REGARDING TREATMENT OF POST-PETITION ARREARS  
PURSUANT TO FORBEARANCE AGREEMENT**

The relief set forth on the following pages, numbered two (2) through three (3) is hereby  
**ORDERED.**

**DATED: December 23, 2020**

A handwritten signature in black ink, appearing to read "Vincent F. Papalia".

Honorable Vincent F. Papalia  
United States Bankruptcy Judge

THIS MATTER having come before the Court on the Debtor's Request to Forbear Mortgage Payments, by and through her counsel, Christine F. Curran, and Nationstar Mortgage LLC d/b/a Mr. Cooper ("Secured Creditor") the Secured Creditor on the Debtor's real property located at 2109 Peer Place, Denville Township, New Jersey 07834 (the "Property"), represented by RAS Citron, LLC, and the parties agreeing to the entry of this Order resolving repayment of forborne mortgage payments, and for good cause shown; it is ORDERED AND DECREED as follows:

1. Secured Creditor filed its Proof of Claim on July 19, 2016 as Claim 10-1. Pursuant to the Proof of Claim, the pre-petition arrears owed Secured Creditor are \$23,402.20.
2. On or about May 7, 2020, Secured Creditor filed a Notice of Debtor's Request for Mortgage Forbearance Due to the Covid-19 Pandemic (*See* Docket No. 55). Pursuant to the Notice of Request for Mortgage Forbearance, the parties agreed to forbear post-petition obligations that would come due for one-hundred eighty (180) days from April 1, 2020 through and including September 1, 2020.
3. As of December 3, 2020, the current post-petition default which has resulted as a result of the Forbearance Agreement includes the June 1, 2020 through and including the December 1, 2020 payment, less \$1,369.52 in suspense, for a total of \$13,181.38.
4. The amount of \$13,181.38 shall be capitalized into the Debtor's Chapter 13 Plan and paid to Secured Creditor by the Chapter 13 Trustee in addition to the amount set forth on Secured Creditor's timely filed Proof of Claim. Debtor must file a Modified Plan within fourteen (14) days of the entry of this Order. The Debtor's monthly payment to the Chapter 13 Trustee will be modified to an amount necessary to appropriately fund the Plan in accordance with this Order.
5. The Debtor shall commence ongoing post-petition payments in the amount of \$2,078.70 directly to Secured Creditor commencing on January 1, 2021. This amount is subject to change based on escrow and/or interest rate adjustments.
6. Secured Creditor shall retain its first mortgage lien on the Property and none of its rights are being modified.
7. The parties agree that this Consent Order in no way alters, amends, or invalidates any applicable bankruptcy remedies afforded to them.
8. Facsimile signatures shall be valid as original signatures and this Consent Order may be executed in counterparts.
9. This order shall be incorporated in and become part of any Order Confirming Plan in the herein matter.

The undersigned hereby consent to the form and entry of the foregoing order.

Christine F. Curran

Christine F. Curran, Esq.

*Attorney for Debtor*

Date: 12/14/2020

/s/ Shauna M. Deluca

Shauna M. Deluca Esq.

*Attorney for Secured Creditor*

Date: December 4, 2020

In re:  
Norbey M Pareja  
Debtor(s)

Case No. 16-18469-VFP  
Chapter 13

District/off: 0312-2  
Date Rcvd: Dec 28, 2020

User: admin  
Form ID: pdf903

Page 1 of 2  
Total Noticed: 1

The following symbols are used throughout this certificate:

**Symbol** **Definition**

+ Addresses marked '+' were corrected by inserting the ZIP, adding the last four digits to complete the zip +4, or replacing an incorrect ZIP. USPS regulations require that automation-compatible mail display the correct ZIP.

**Notice by first class mail was sent to the following persons/entities by the Bankruptcy Noticing Center on Dec 30, 2020:**

Recip ID	Recipient Name and Address
db	+ Norbey M Pareja, 2109 Peer Place, Denville, NJ 07834-3714

TOTAL: 1

**Notice by electronic transmission was sent to the following persons/entities by the Bankruptcy Noticing Center.**  
Electronic transmission includes sending notices via email (Email/text and Email/PDF), and electronic data interchange (EDI).

NONE

## BYPASSED RECIPIENTS

The following addresses were not sent this bankruptcy notice due to an undeliverable address, \*duplicate of an address listed above, \*P duplicate of a preferred address, or ## out of date forwarding orders with USPS.

NONE

## NOTICE CERTIFICATION

I, Joseph Speetjens, declare under the penalty of perjury that I have sent the attached document to the above listed entities in the manner shown, and prepared the Certificate of Notice and that it is true and correct to the best of my information and belief.

**Meeting of Creditor Notices only (Official Form 309): Pursuant to Fed .R. Bank. P.2002(a)(1), a notice containing the complete Social Security Number (SSN) of the debtor(s) was furnished to all parties listed. This official court copy contains the redacted SSN as required by the bankruptcy rules and the Judiciary's privacy policies.**

Date: Dec 30, 2020

Signature: /s/Joseph Speetjens

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## CM/ECF NOTICE OF ELECTRONIC FILING

The following persons/entities were sent notice through the court's CM/ECF electronic mail (Email) system on December 28, 2020 at the address(es) listed below:

Name	Email Address
Denise E. Carlon	on behalf of Creditor Embrace Home Loans Inc. dcarlon@kmllawgroup.com, bkgroup@kmllawgroup.com
Francesca Ann Arcure	on behalf of Creditor Toyota Motor Credit NJ_ECF_Notices@McCalla.com NJ_ECF_Notices@McCalla.com
John R. Morton, Jr.	on behalf of Creditor Ford Motor Credit Company LLC ecfmail@mortoncraig.com, mortoncraigecf@gmail.com
Kevin M. Butterly	on behalf of Creditor NATIONSTAR MORTGAGE LLC bkyefile@rasflaw.com
Laura M. Egerman	on behalf of Creditor Nationstar Mortgage LLC bkyecf@rasflaw.com bkyecf@rasflaw.com;legerman@rasnj.com
Marie-Ann Greenberg	magecf@magtrustee.com

District/off: 0312-2

User: admin

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Date Rcvd: Dec 28, 2020

Form ID: pdf903

Total Noticed: 1

Patrick O. Lacsina

on behalf of Creditor NATIONSTAR MORTGAGE LLC , PATRICK.LACSINA@GMAIL.COM

Scott E. Tanne

on behalf of Debtor Norbey M Pareja ecf@tannelaw.com tanne.ecf.email@gmail.com;tannesr87179@notify.bestcase.com

Shauna M Deluca

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Shauna M Deluca

on behalf of Creditor NATIONSTAR MORTGAGE LLC sdeluca@rasflaw.com

Sindi Mncina

on behalf of Creditor Nationstar Mortgage LLC smncina@rascrane.com

TOTAL: 11